

Small Quantity Generators and Conditionally Exempt Small Quantity Generators of Used Oil

What exactly is a Small Quantity Generator (SQG) or a Conditionally Exempt Small Quantity Generator (CESQG) of used oil? These terms are defined in Title 40 of the Code of Federal Regulations.

A **Small Quantity Generator** of used oil is a business that generates between 220 and 2200 pounds of used oil per month. This is about 27 to 275-gallons of used oil.

A **Conditionally Exempt Small Quantity Generator** of used oil is a business that generates 220 pounds (27-gallons) or less of used oil per month.

Why is this important to CIWMB's Used Oil Recycling Program? In general, transportation of used oil must be by registered hazardous waste hauler. However, household or do-it-yourselfer (DIY) generators of used oil are exempt from this requirement, subject to several restrictions. First, these DIYs are only allowed to transport their own oil to an authorized used oil collection center. These would include Certified Used Oil Collection Centers, Household Hazardous Waste collection events, or other collection facilities as authorized by the California Health and Safety Code. Second, the DIY transporter may transport no more than 55-gallons, in containers not to exceed 55-gallons in volume, per trip.

The California Department of Toxic Substances Control (DTSC) considers CESQG's to be the same as do-it-yourselfers, as far as transportation of used oil is concerned. This means that the operator of Tom's Lawn Mower Shop, for example, can take the used oil he generates in the operation of his business to a Certified Used Oil Collection Center and receive the recycling incentive of sixteen cents (\$0.16) per gallon, provided he takes 55-gallons or less per day, and the containers are 55-gallons or smaller.

Note that many collection centers impose their own maximum volume of oil accepted, which may be as low as 5-gallons per person (or business) per day. It is important to call ahead to the collection center before transporting the oil.

Block Grant Support of CESQGs

Block Grant funds can be used to support collection from CESQGs. In fact, CESQGs could be a group that Grantees may wish to target with education and collection opportunities. Often CESQGs "fall through the cracks" and are not aware of the rules and regulations governing used oil and filters. They are also often not aware of the opportunities for collection that are available to them.

Please note that certified center operators often are not aware that they can accept used oil and filters from CESQGs. While certified centers are not required nor expected to take large quantities of used oil from businesses, they should be encouraged to accept used oil and filters from legitimate CESQGs.

Small Quantity Generators (SQG) and Large Quantity Generators (LQG)

SQG and LQG (businesses that generate more than 275-gallons per month) must have their oil hauled by a registered hazardous waste hauler, and thus cannot bring their used oil to a certified center. These generators can, however, register as industrial generators of used oil and claim the incentive directly from the CIWMB.

Block Grant Support of SQGs and LQGs

While support of these generators is not specifically addressed in the California Oil Recycling Enhancement Act, in certain instances, it is warranted due to a particular situation in a jurisdiction. For example, there are a number of local agricultural outreach programs that support the collection of used oil from growers and ranchers.

Other groups that may warrant attention and support include independent truck drivers, small landscaping operations, logging operations, etc. Groups like these typically do not have the information and the financial ability to properly manage their used oil and filters. If a Grantee has determined that outreach to these groups is warranted, please contact your Grant Manager to discuss a strategy and what types of costs would be eligible.

For More Information

DTSC has a very informative fact sheet on used oil management titled "Used Oil and Filter Management" updated April 2001. It is available on the DTSC website at: www.dtsc.ca.gov - select the "Publications and Forms" link, then the "Publications Index." The fact sheet is under the Keyword "Oil."

You can also contact DTSC for a copy of the Used Oil fact sheet. Specific questions on management of used oil should be directed to a DTSC duty officer by calling 1-800-728-6942 or 800 72-TOXIC. You can also call the nearest DTSC regional office:

Sacramento (916) 255-3545
Berkeley (510) 540-2122
Clovis (Fresno) (559) 297-3901
Glendale (818) 551-2800
Cypress (714) 484-5300

More information on used oil storage, management, and transportation requirements can be found in the California Health and Safety Code, sections 25218 through 25218.12, and 25250, *et seq.*